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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

CR21-03070 TUC-RM(LAB)

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,	No.
Plaintiff,	INDICTMENT
vs.	VIO: 18 U.S.C. § 554(a) (Smuggling Goods from the United States) Count 1
Dagoberto Verdugo-Aguirre,	18 U.S.C. § 924(d); 28 U.S.C. § 2461(c) Forfeiture Allegation
Defendant.	

THE GRAND JURY CHARGES:

COUNT 1

Between or about July 20, 2020, and July 22, 2020, in the District of Arizona, Defendant DAGOBERTO VERDUGO-AGUIRRE fraudulently and knowingly exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, to wit: 23,280 rounds of 7.62x39mm ammunition, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819; and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774;

In violation of Title 18, United States Code, Section 554(a).

FORFEITURE ALLEGATION

Upon conviction of Count One of this Indictment, Defendant DAGOBERTO VERDUGO-AGUIRRE shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any ammunition involved in the commission of the offense, including, but not limited to, 23,280 rounds of 7.62x39mm ammunition.

If any of the property described above, as a result of any act or omission of the defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendant.

All pursuant to Title 18, United States Code, Section 924(d); Title 28, United States Code, Section 2461(c); and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

/S/

FOREPERSON OF THE GRAND JURY
Dated: December 1, 2021

GARY M. RESTAINO
United States Attorney
District of Arizona

**REDACTED FOR
PUBLIC DISCLOSURE**

/S/

ANGELA W. WOOLRIDGE
Assistant U.S. Attorney